

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**JOSEPH MICHAEL PHILLIPS,**

*Plaintiff,*

v.

**COLLIN COMMUNITY COLLEGE  
DISTRICT, et al.**

*Defendants.*

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**Civil Action No.: 4-22-cv-184**

**DEFENDANTS' NOTICE OF DEPOSITION DESIGNATIONS FOR TRIAL**

Pursuant to Fed. R. Civ. P. 5(d)(1)(A), 31 and 32 and this Court's Amended Scheduling Order [Dkt. 52], Defendants file the following designations of the depositions by written questions that Defendants intend to introduce at trial:

1. Direct Questions to be Propounded to the Witness, Custodian of Records For: Texas Christian University, questions and answers No. 5 and 6, plus attached documents.
2. Direct Questions to be Propounded to the Witness, Custodian of Records For: University of North Texas, questions and answers No. 5 and 6, plus attached documents.
3. Direct Questions to be Propounded to the Witness, Custodian of Records For: Texas Women's University, questions and answers No. 5 and 6, plus attached documents.
4. Direct Questions to be Propounded to the Witness, Custodian of Records For: Dallas College – Human Resources, questions and answers No. 5 and 6, plus attached documents.
5. Direct Questions to be Propounded to the Witness, Custodian of Records For: Austin Community College, questions and answers No. 5 and 6.
6. Direct Questions to be Propounded to the Witness, Custodian of Records For: Texas A&M University, questions and answers No. 5 and 6.

7. Direct Questions to be Propounded to the Witness, Custodian of Records For: Tarleton State University, questions and answers No. 3, 5 and 6.

8. Direct Questions to be Propounded to the Witness, Custodian of Records For: Houston Community College, questions and answers No. 4-7, plus attached documents.

9. Direct Questions to be Propounded to the Witness, Custodian of Records For: University of Texas at Dallas, questions and answers No. 9-11, plus attached documents.

Because each of the above depositions by written questions will be used at trial, a copy of each deposition (and attached responsive documents) is attached hereto and filed with the Court pursuant to Fed. R. Civ. P. 5(d)(1)(A), 31 and 32.

Respectfully submitted,

**ABERNATHY, ROEDER, BOYD &  
HULLETT, P.C.**

*/s/Charles J. Crawford*

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2023, a true and correct copy of Defendants' Notice of Deposition Designations for Trial was served upon Plaintiff's counsel via the Court's ECF system.

*/s/ Charles J. Crawford*

Charles J. Crawford